REMARKS

Applicant has carefully reviewed the Application in light of the Final Office Action mailed April 8, 2009. At the time of the Office Action, Claims 1-3, 6-10, 12-33, 36-40, 42-43, 45-46 and 48-88 were pending in the Application and stand rejected. Claims 13-30 were withdrawn. Applicant respectfully requests reconsideration of the pending claims and favorable action in this case.

Section 103 Rejection

The Examiner rejects Claims 1-3, 31-33, 43, 46, 51, 53, 55-64 and 77-88 under 35 U.S.C §103(a) as being unpatentable over U.S. Publication No. 2002/0141418 issued to Ben-Dor et al. (hereinafter "*Ben-Dor*") in view of U.S. Patent No. 5,710,885 issued to Bondi (hereinafter "*Bondi*"). The Examiner further rejects Claims 6-10, 12, 36-40, 42, 45, 48-50, 52 and 54 under 35 U.S.C. §103(a) as being unpatentable over *Ben-Dor* in view of *Bondi* further in view of U.S. Patent No. 6,157,950 issued to Krishnan (hereinafter "*Krishnan*"). Claims 11 and 41 are rejected under 35 U.S.C. §103(a) as being unpatentable over *Ben-Dor* in view of *Bondi* further in view of *Krishnan* and further in view of U.S. Patent No. 6,611,881 issued to Gottfurcht et al. (hereinafter "*Gottfurcht*"). Claims 65-76 are rejected under 35 U.S.C. §103(a) as being unpatentable over *Ben-Dor* in view of *Bondi* further in view of Official Notice (hereinafter "*Official Notice*").

As an initial matter, Applicant is disappointed by the Examiner's response to Applicant's previous arguments, as the Examiner has not fully addressed Applicant's contentions. Putting aside that incomplete response, and turning to other missing limitations of Independent Claim 1, this claim recites "...a polling routine configured to poll each of possible USB device adapters connected to the network in accordance with a candidate list, and ***compile a master list of only the possible USB device adapters which responded to the polling*** and are therefore currently capable of establishing a connection over the network, wherein the candidate list is initially configured with one or more possible USB device adapters." For this last underlined

limitation, there is nothing in *Ben-Dor* for this feature. Specifically, the Examiner cites the following passage to support his rejection:

> [**0136**] The network host may send an RPS Announcement Packet Request to an RPS. In one embodiment, this packet is transported through use of TCP and is addressed to the RPS through use of an IP address. This request is used in special cases where a network host has not received an RPS Announcement packet (RAP) multicast. When an RPS receives a RAP Request, it sends out a RAP multicast to all interested network hosts. Note that there is no tunneling specific data associated with an RPS Announcement Packet (RAP) Request (only the common tunneling header).

First, where is the candidate list being ***initially configured with one or more possible USB device adapters***? Second, where is the candidate list itself? Third, where is there a compiling operation of a master list of only the possible USB device adapters that responded to the polling? In *Ben-Dor*, there is no initial configuration of a candidate list, there is no candidate list identified, and there is no master list being compiled of USB device adapters that responded to the polling.

Additionally, Independent Claim 1 recites "...the USB device adapters are coupled to USB devices that send USB packets to a USB protocol stack, which passes those packets to a network bridging task that identifies address information associated with the USB devices and the remote host control driver, and that passes the address information to the network protocol stack." Once again, *Ben-Dor* is flawed in that it is missing several of these limitations. Continuing along the numbering previously outlined, and as a fourth proposition, where is the network bridging task that identifies address information? Fifth, where is such an element being discussed as interfacing with a protocol stack? The addressing information being outlined by Independent Claim 1 is for both the USB devices and for the remote control host control driver and yet this is not accounted for in any of the cited references. The activities outlined by

Independent Claim 1 lead to information being provided to the network protocol stack, which in turn offers encapsulation capabilities. Once again, the Examiner identifies portions of *Ben-Dor* for all of these limitations. Specifically, the Examiner cites paragraph 73 of this reference, which provides:

> [0073] When using the USB tunneling driver (redirector), under Windows 98 and windows 2000, the USB tunneling driver (redirector) loads as a virtual USB Host Controller Driver (HCD). Normally a USB Host Controller Driver serves as an interface between the USB Bus Driver and actual USB hardware (registers and DMA interfaces), such as OHCI/UHCI based host silicon. The USB tunneling driver (redirector) loads as a virtual USB Host Controller Driver bus does not interface with actual USB hardware. Instead, it accepts USB Request Blocks (URBs) from the USB Bus Driver, encapsulates them within TCP or UDP, with a tunneling header, and sends them down the networking stack through use of the TDI Interface. All communication between the USB Bus Driver, the TDI Network Interface to the networking stack, and the USB tunneling driver (redirector) is based on IRPs (I/O Request Packets). IRPs are described in Microsoft's Device Driver Kit (DDK), and are the standard kernel mode method of communicating among drivers under Windows 98, Windows NT, and the Windows 2000.

Clearly, *Ben-Dor* fails to offer any system in which USB device adapters are coupled to USB devices that send USB packets to a USB protocol stack, which passes those packets to a network bridging task that identifies address information associated with the USB devices and the remote host control driver, and that passes the address information to the network protocol stack. The redirector does not provide address information for both items, nor is it even in communication with the network protocol stack: much less one that performs encapsulation capabilities, as outlined by Independent Claim 1.

All these important limitations are provided for in Independent Claim 1, but no reference of record includes such elements. In addition, the other Independent Claims recite limitations that are similar, but not identical, and are therefore allowable over the proposed

combination(s) using a similar rationale. In addition, the respective dependent claims from these Independent Claims should be allowable using analogous reasoning.

For at least these reasons, all of the pending claims have been shown to be allowable as they are patentable over the references of record. Notice to this effect is respectfully requested in the form of a full allowance of these claims.

CONCLUSION

Applicant has now made an earnest attempt to place this case in condition for immediate allowance. For the foregoing reasons and for all other reasons clear and apparent, Applicant respectfully requests reconsideration and allowance of the pending claims.

The Request for Continued Examination fee in the amount of $810 is being paid concurrently herewith via the Electronic Filing System (EFS) by way of Deposit Account No. 50-4889 authorization. No additional fees are believed due. However, please apply any other charges or credit any overpayment to Deposit Account No. 50-4889 of PATENT CAPITAL GROUP, referencing the attorney docket number referenced above.

If there are matters that can be discussed by telephone to advance prosecution of this application, Applicant invites the Examiner to contact Thomas J. Frame at 214-823-1241.

Respectfully submitted,

Patent Capital Group
Attorneys for Applicant

/Thomas J. Frame/
Thomas J. Frame
Reg. No. 47,232

Date: July 6, 2009

Customer No. 86421